

Danielle E. Karst (D.C. Bar No. 481881)  
Timothy J. Mulreany (Maryland Bar No. 8812160123)  
**COMMODITY FUTURES TRADING COMMISSION**  
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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

COMMODITY FUTURES TRADING  
COMMISSION,

Plaintiff,

v.

DAVID GILBERT SAFFRON  
a/k/a DAVID GILBERT and  
CIRCLE SOCIETY, CORP.,

Defendants.

Case No. 2:19-cv-1697-JAD-DJA

**APPLICATION FOR ENTRY OF DEFAULT  
AGAINST DEFENDANT CIRCLE  
SOCIETY, CORP.**

**TO THE CLERK OF THE ABOVE-TITLED COURT:**

Plaintiff, Commodity Futures Trading Commission, respectfully requests that the Clerk enter default in this action pursuant to Federal Rule of Civil Procedure 55(a) against Circle Society, Corp. ("Defendant"), on grounds that the Defendant was duly served with the Summons and Complaint in this action but has failed to plead within the time prescribed by the Federal Rules of Civil Procedure. *See* Declaration of Danielle Karst in support of Plaintiff's Application for Entry of Default Against Defendant Circle Society, submitted herewith.

1 Dated: November 4, 2019

Respectfully submitted,

2 By: /s/ Danielle E. Karst

Danielle E. Karst

3 Timothy J. Mulreany

**COMMODITY FUTURES TRADING  
COMMISSION**

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5 1155 21st Street, N.W.

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**CERTIFICATE OF SERVICE**

On November 4, 2019, I served a copy of *Plaintiff's Application for Entry of Default Against Defendant Circle Society, Corp.* and *Declaration of Danielle Karst in Support of the Application* with the Clerk of the Court using the CM/ECF system. I also certify that on November 4, 2019, I sent hard copies of the same to Defendants David Gilbert Saffron and Circle Society, Corp. via United Parcel Service overnight mail at the following addresses:

**David Gilbert Saffron**

Las Vegas, NV  
(Last-Known Address)

**Circle Society, Corp.**

c/o Michael C. Van, Esq.  
8985 S. Eastern Ave., Suite 100  
Las Vegas, NV 89123

**Circle Society, Corp.**

c/o Registered Agent, Preston Sterling Kerr  
2450 Saint Rose Parkway, Suite 120  
Henderson, NV 89074

Date: November 4, 2019

/s/ Danielle E. Karst